

IN THE DISTRICT COURT OF GRANT COUNTY  
STATE OF OKLAHOMA

LAMBERT D. DUNN, SR.

Plaintiff,

-vs-

UNIT CORPORATION, a/k/a and d/b/a  
UNIT DRILLING

Defendant.

Case No.: CJ 13-27



PETITION

COMES NOW THE PLAINTIFF, Lambert D. Dunn, Sr., and for his Petition in the

above-entitled action, alleges and states as follows:

1. That the Defendant, Unit a/k/a and d/b/a Unit Drilling (hereinafter "Defendant"), is a corporation located and operating in the state of Oklahoma. That the causes of action give rise to damages in excess of One Hundred Thousand dollars (\$100,000.00). That this Court has jurisdiction and venue over these causes of action.

2. That the actions, agreements, breach of agreements, and/or acts complained of herein all occurred in the State of Oklahoma.

3. That the Plaintiff and Defendant entered into an employment agreement in the state of Oklahoma. That the Plaintiff and Defendant entered into an agreement in Grant County, Oklahoma. That the Plaintiff was injured in Grant County, Oklahoma. The Plaintiff sacrificing his safety and well-being went to work for the Defendant as a roughneck and driller for the Defendant for over fifteen years. Plaintiff was injured on the job and rightfully sought and was given benefits through the Oklahoma Workers' Compensation Statute, located in Title 85. In return for sacrificing his time and his health, while the Plaintiff was still receiving benefits

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through the Oklahoma Workers' Compensation Statute, he was terminated by the Defendant and/or denied rightful benefits without notice. Those actions by the Defendant were retaliatory against the Plaintiff for his failure to work and seeking benefits in the Workers' Compensation Court of Oklahoma.

4. Plaintiff was alerted of such termination upon investigating his denial of benefits on August 23, 2013.

5. That Defendant breached Title 85 Section 341 and without notice effectively terminated the Plaintiff, while the Plaintiff was receiving Total Temporary Benefits through an active Workers' Compensation Claim.

6. That the Defendant further terminated the health benefits of the Plaintiff.

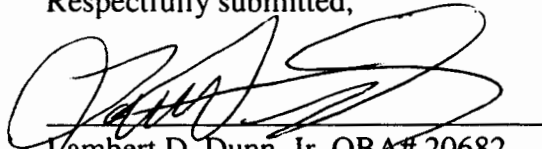
7. That the Defendant's actions violated Federal law in failing to timely provide COBRA. That the Plaintiff was denied benefits during that time and has failed to receive adequate treatment. That Plaintiff has rights to bring said action under 29 U.S.C.A. § 1132.

8. That such acts were willful, wanton, and in direct violation of the Laws of the State of Oklahoma and the United States of America and warrant punitive damages.

9. That the Plaintiff has suffered damages due to the actions of the Defendant. That Defendant's actions caused the Plaintiff to delay necessary medical procedures, caused mental stress, and has contributed to the injuries that Plaintiff had already received from working for over fifteen (15) years for the Defendant.

WHEREFORE, Plaintiff, Lambert D. Dunn, Sr., demands judgment against the Defendant for an amount in excess of \$100,000.00, plus costs of this action, interest as provided for by law, and punitive or exemplary damages as provided by law, together with any and all further relief deemed justified in the premises.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'L. Dunn', is written over a horizontal line.

Lambert D. Dunn, Jr. OBA# 20682  
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